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December 15, 2005

**VIA ELECTRONIC FILING**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
The Portals  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: **EX PARTE SUBMISSION**

WT Docket No. 03-66; Amendment of Parts 1, 21, 73, 74 and 101 of the  
Commission's Rules to Facilitate the Provision of Fixed and  
Mobile Broadband Access, Educational and Other Advanced Services  
in the 2150-2162 and 2500- 2690 MHz Bands

Dear Ms. Dortch:

On behalf of the National ITFS Association (NIA) and the Catholic Television Network ("CTN"), Edwin N. Lavergne and I made an ex parte presentation today by telephone to John Giusti of Commissioner Copps' office, regarding the referenced proceeding.

Our presentation focused on the issue whether the FCC should modify the substantive EBS lease requirement limiting such leases to 15 years. NIA and CTN continue to believe that the 15-year limit clearly furthers the educational purposes of EBS by, among other things, ensuring an opportunity for educators to reevaluate their educational use and leasing activities on a periodic basis.

Pursuant to Section 1.1206(b)(2) of the Commission's Rules, we are submitting this summary of the presentation by filing an electronic copy of this letter in the public record of the proceeding.

Should any questions arise concerning this matter, kindly contact undersigned counsel for the National ITFS Association or Mr. Lavergne, counsel for CTN.

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Respectfully submitted,

/s/ Todd D. Gray

Todd D. Gray

cc by email: Mr. John Giusti  
Edwin N. Lavergne, Counsel to CTN